



1700 G Street NW, Washington, D.C. 20552

October 18, 2024

Hon. Michael J. Roemer
U.S. Magistrate Judge
2 Niagara Square, 5th Floor
Buffalo, NY 14202

RE: *CFPB et al. v. StratFS, LLC et al.*, No. 24-cv-40-EAW-MJR (W.D.N.Y.)

Dear Magistrate Judge Roemer,

The Consumer Financial Protection Bureau (CFPB); the New York Attorney General's Office; the Wisconsin Department of Justice ("the Plaintiffs") and Defendants Richard Gustafson, Jason Blust, and Relialit, LitDef and Hedgewick ("Defendants" and collectively with the Plaintiffs "the Parties"), have reached an agreement on scheduling of responses and replies to Dkts. 450, 452, and 453 ("the Motions to Dismiss") and page limits for those filings.

The Parties respectfully request that the Court approve the filing of omnibus responses and replies to the Motions to Dismiss. The Motions to Dismiss contain similar arguments, and the Court's approval of this request would make drafting for the Parties and review by the Court more efficient. Given that these omnibus responses and replies apply to three motions, the Parties also request 15 additional pages beyond the usual page limits allowed for under Local Rule 7(a)(2)(C), and a short one-week extension beyond the usual time allowed under Local Rule 7(b)(2)(B) for Plaintiffs' omnibus response and Defendants' omnibus reply.

Specifically, the Parties request that the Court approve the following:

- 1) the filing of a single omnibus response brief and single omnibus reply brief that address the Motions to Dismiss;
- 2) 15 additional pages beyond the 25-page and 10-page limits for responses and replies allowed for under Local Rule 7(a)(2)(C), so that Plaintiffs may have a 40-page limit for their single omnibus response brief, and Defendants may have a 25-page limit for their single omnibus reply brief; and

- 3) a one-week extension to the usual two-week response and one-week reply deadlines under Local Rule 7(b)(2)(B) for the omnibus response brief and omnibus reply brief as follows:

Filing Event	Proposed Deadline
Plaintiffs' omnibus response to Dkts. 450, 452, and 453	November 5, 2024
Defendants' omnibus reply to responses to Dkts. 450, 452, and 453	November 19, 2024

Respectfully,

/s/ Joe Sanders

Joseph Sanders
Vanessa Buchko
Shirley Chiu
Consumer Financial Protection Bureau

/s/ Genevieve Rados

Genevieve Rados
Christopher Boyd
Attorney General of the State of New York

/s/ Lewis Beilin

Lewis Beilin
Wisconsin Department of Justice

/s/ Rod Personius

Rod Personius
Personius Melber LLP
Counsel for Jason Blust, Relialit, LitDef and Hedgewick

/s/ Terrence M. Connors

Terrence M. Connors
Connors LLP
Counsel For Richard Gustafson